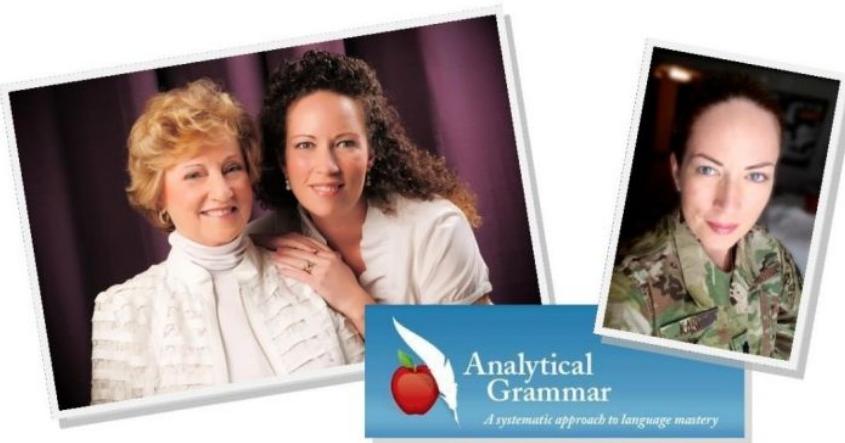


EXHIBIT
1

Start a GoFundMe

Sign in Share Donate

Vet-Owned Small Biz SUED for Sharing a Viral Meme



Erin Finley Karl is organizing this fundraiser.

The short version:

A veteran-owned small business is being sued for copyright infringement over a viral meme shared on its business Facebook page. The purpose of this GoFundMe is to raise money to cover legal fees expected to be necessary to defend her business in the lawsuit.

The long version:

My name is Erin Karl. I'm an actively drilling Air Force reservist and the owner of Analytical Grammar, a company started by my mother more than two decades ago when she wrote a grammar curriculum for her 8th grade public school

class. Case 5:18-cv-00249-EL in Document 98-2 | Filed 09/02/21 Page 1 of 8

\$40,969 raised of
\$100,000 goal

868 donors **339** shares **1.5K** followers



Share



Donate now



Anonymous

\$200 • 3 d



Gordon Lutz

\$25 • 28 d



Anonymous

\$10 • 1 mo



Anonymous

\$25 • 1 mo



Anonymous

\$20 • 1 mo



See top See donationstop

the company from the basement of my home in
North Carolina.

You can learn about my company on our website:
www.analyticalgrammar.com

Over the last few years I've grown a large Facebook presence on my company page. It now has nearly 800,000 followers. Our page is known for daily grammar lessons, grammar fails, and a deep love for puns.

Visit our FB page here:
www.facebook.com/analyticalgrammar

In Dec 2017 we shared a picture of a visual pun that was going viral around the internet. It also went viral from our page.

Fast forward to August 2019. Analytical Grammar was served a lawsuit on behalf of Matthew Bradley of Windsor, California, who says he created the meme. There had previously been no communication between Bradley and AG.

Representing Bradley is New York attorney Richard Liebowitz.

Here are a few articles about this well-known copyright lawyer:

Slate.com

Hollywood Reporter

TechDirt.com

Erin has Dan Booth, a lawyer experienced with Liebowitz, in her corner. Dan has written his own

blog Case 5:19-cv-00249-FL Document 93-2 Filed 09/02/21 Page 2 of 8

Here is the original complaint, Exhibit A(the allegedly infringed photograph), Exhibit B(the FB post), and Analytical Grammar's answer and counterclaims.

Please understand that this is ongoing litigation, so there are some things we can't say. However, my very experienced attorney has things well in hand.

While the details of our defense and this lawsuit will remain private, I'll post updates of publicly filed material when I can. Please know that we had no reason to believe that anyone was claiming copyright over the meme when we came across it. The photo had no copyright symbol or watermark,

and it had been shared so widely that we could not locate the original source.

Defending my small business against this lawsuit will cost thousands of dollars. I've created this GoFundMe to respectfully ask for your help. While I do have a large social media presence, my company is very small. I simply can't absorb these costs, and I want desperately to keep publishing the amazing curriculum my mother authored all those years ago.

If this campaign succeeds in covering the legal costs and has funds remaining, I will use the money to purchase litigation insurance for Analytical Grammar (something I do not currently have), which may help me in the future if it happens again.

Updates (18)

July 20, 2021 by Erin Finley Karl, Organizer

Hello friends! It's time for an update. You know the

case a few months, ago. That was amazing! However, the hits just keep on coming. The plaintiff's attorney, Richard Liebowitz, was kicked off the case, and Mr. Bradley has new representation.

The attached video goes over the most recent update. According to Mr. Bradley, Mr. Liebowitz never told him of the offers to settle, the possible defenses to his lawsuit (which we used to win), or the fact that he could be held liable for paying my attorney's fees if he lost.

As such, Mr. Bradley and I, through our attorneys, are seeking the \$185,000 in fees from Mr. Liebowitz in the form of sanctions for his alleged wrongdoings while representing Mr. Bradley. (Mr. Bradley was represented on contingency by Mr. Liebowitz, so he has no attorney's fees to date.)

So, again, we wait. In the meantime, I'm still attempting to pay a little each month to my lawyers. It's very, VERY tight for me to do so, but they deserve to be paid for their amazing work. All the paperwork and research for the filings necessary to seek these sanctions add to my attorney's fees. My only other option would be to NOT fight for my fees to be paid, and then where would I be? More importantly, where would ANYONE who might be, in the future, slammed with a disingenuous copyright suit like this be if I didn't fight?

"The only thing necessary for the triumph of evil is for good men to do nothing."

As the video states, I will offer to return any donations made to this GoFundMe when (not if?) we win these sanctions and they're paid. In the meantime, I humbly ask for your help. If you can, please donate. If you will, please share this on your social media pages. If you're willing, keep me in your thoughts and prayers as this moves forward. For all of these things, I can't thank you enough!

-Erin



[See older updates](#)

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Organizer



Erin Finley Karl
Organizer
Raleigh, NC

[Contact](#)

Comments (168)



TIMOTHY LEE donated **\$100**

Heard you through Leonard's Lawful Masses's Youtube video and just wanted to give a bit to help you with the mess you've been going through. Hope things go well soon. Cheers.

1 mo



Earl Tarble donated **\$100**

Bloodsucking lawyers annoy me and I liked Analytic Grammar.

1 mo



J.R. Robertson donated **\$25**

Go get'em! Keep fighting the good fight!

Case 5:19-cv-00249-FL Document 93-2 Filed 09/02/21 Page 5 of 8

1 mo



Andrew E Hart donated **\$100**

From one vet to another - good job on an important fight! Wishing you only the best for the future. Drew Hart

1 mo



Kathy Winger donated **\$100**

You are the person I want to be when I grow up. [No refund necessary. Perhaps you can use any excess funds toward reacquiring AG. It's not the same without you.]

2 mos



Justin Wilson donated **\$50**

Good luck. No refund necessary.

5 mos



Lynn Taylor donated **\$25**

Thank you for fighting the good fight.

5 mos



Jeff Wolfe donated **\$100**

I saw you on Lenard French's Lawful Masses [redacted] You did the right thing, not the easy way and I respect that. I hope this case

Fundraiser by Erin Finley Karl : Vet-Owned Small Biz SUED for Sharing a Viral Meme
puts one more nail in the coffin of this
trolling career.

5 mos



Nicole Young donated **\$100**

As a daughter of a USAF career Colonel, I support veteran-owned business. Prayers to you, Erin and family; I hope this ends soon with a judgment in your favor re: legal fees.

5 mos



James Harkins donated **\$10**

To support a Veteran-Owned Small Buisiness against an unethical copy-troll..

5 mos

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Created September 15, 2019 | Other



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